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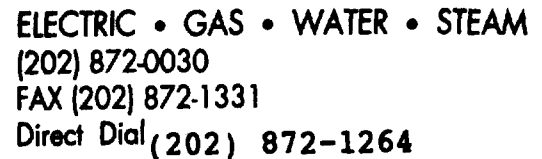
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May 19, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Dear Dr. Stanley:

In both its Comments and Reply Comments in this proceeding, UTC urged the Commission to adopt rules that will: (1) accommodate existing 2 GHz systems that would be displaced by emerging technologies (both "skinny-route" and wider bandwidth private microwave systems); (2) accommodate new private microwave systems that would have been licensed in the 2 GHz band but for the reallocation of that band:

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The Commission commenced this proceeding in response to separate, but similar, petitions for rulemaking filed by UTC and Alcatel Network Systems (Alcatel). The Commission recognized that in order to promote the development of emerging technologies in the 2 GHz band it would be necessary to accommodate the needs of the 29,000 fixed microwave systems currently supported by the 2 GHz band. Fundamental to the Commission's emerging technologies proposal is the use of market-based incentives to ensure a graceful transition.

Adoption of a "band-splitting" compromise will not advance the Commission's goals in this proceeding, nor will it serve the interests of microwave users while UTC


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If, on the other hand, the Commission adopts a relatively consistent channeling plan for all bands in question, it is much more likely that there will be multiple equipment suppliers for each band. A competitive equipment market will --

1. Expand user choice (thereby facilitating the negotiations and decision-making involved in relocating from the 2 GHz band);
2. Reduce the costs of relocating from the 2 GHz band (which will inure to the benefit of emerging technology licensees responsible for absorbing those costs); and
3. Ensure the wider availability of microwave equipment (which will shorten the time required to complete a conversion from the 2 GHz band, and thereby expedite the introduction of emerging technologies).

In conclusion, UTC respectfully urges the Commission not to divide channelization plans among frequency bands such that users will suffer from a corresponding division of the equipment market.

Very truly yours,



Jeffrey L. Sheldon
General Counsel

cc: David Siddall, FCC
Rodney Small, FCC
Paul Marrangoni, FCC